

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Atlas Resin Proppants, LLC
N7530 County Road P
Taylor, Wisconsin 54659

ATTENTION:

Dawn Tiffany
Safety, Health & Environmental Specialist

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Atlas Resin Proppants, LLC (you) to submit certain information about your facility at N7530 County Road P, Taylor, Wisconsin. Appendices C and D specify the information that you must submit. Appendix B specifies the instructions needed to answer this information request. You may assert a claim of business confidentiality according to the requirements in Appendix A. You must send this information to us according to the schedule specified in Appendix C.

We are issuing this information request under Section 114(a) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Atlas Resin Proppants, LLC owns and operates an emission source at your Taylor, Wisconsin facility. We are requesting this information to determine whether your emission source is complying with the Wisconsin State Implementation Plan and the requirements of the Act.

You must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Under 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality for any portion of the submitted information. You must specify the page, paragraph, and sentence when identifying the information subject to your claim. Appendix A specifies the assertion and substantiation requirements for business confidentiality claims. You must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic recordkeeping efforts, EPA requests that you provide all documents responsive to this request in an electronic format in accordance with a. through f., below. These submissions are in lieu of hard copy.

a. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the

document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.

b. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

c. Provide submission on physical media such as compact disk, flash drive or other similar item.

d. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).

e. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please also mark each page that is confidential business information as such.

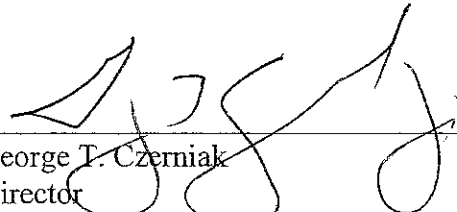
f. Certify that the attached files have been scanned for viruses and indicate what program was used.

Failure to comply fully with this request for information may subject Atlas to an enforcement action under Section 113 of the Act, 42 U.S.C. § 7413.

You should direct any questions about this request for information to Michelle Heger at 312-886-4510 or heger.michelle@epa.gov.

Date

6/12/13


George T. Czerniak
Director
Air and Radiation Division

Appendix A

Confidential Business Information (CBI) Assertion and Substantiation Requirements

A. Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached letter, as provided in 40 C.F.R. § 2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamped or typed legend or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by the United States Environmental Protection Agency (EPA) only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as “Personal Privacy Information” given that disclosure of such information to the general public may constitute an invasion of privacy.

B. Substantiation Requirements

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.** Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being subject to CBI, you must answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2. "Emission data" means, with reference to any source of emission of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which,

under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301 (a)(2)(i)(A), (B) and (C).

Emission data includes, but is not limited to, service records stating the amount of refrigerant added to a unit or reclaimed from a unit.

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Appendix B

When providing the information requested in Appendix C, use the following instructions and definitions.

INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart of a question set forth in the information request.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) that provided information that was used or considered in responding to that question, as well as each person that was consulted in the preparation of that response.
3. Indicate on each document produced in response to this information request, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.

DEFINITIONS

All terms used in this request for information will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. §§ 7401 et seq., 40 C.F.R. Part 52 (which incorporates the federally-approved State Implementation Plan), or other Clean Air Act implementing regulations. Reference is made to the EPA regulatory provisions only; however, you should apply the applicable federally-approved state provisions, when appropriate. Definitional clarification is specified below.

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. The term “Facility” shall mean Atlas Resin Proppants’ resin-coated sand production facility located at N7530 County Road P, Taylor, Wisconsin.
4. The term “Tower” shall mean any of the resin-coated sand production lines, known as Towers A and B, at Atlas Resin Proppants’ Taylor, Wisconsin facility.

5. The term "liquor" shall mean the fluid used in the wet scrubber(s) at Atlas Resin's resin-coated sand production facility.

Appendix C

Within 60 days of receipt of this request, Atlas Resin Proppants must supply the following information in accordance with the foregoing Request for Information pursuant to Section 114(a) of the Clean Air Act 42 U.S.C. § 7414(a), for its facility located at N7530 County Road P, Taylor, Wisconsin:

1. Provide copies of all permits to construct, install, and operate sources of air pollutants (including diagrams, appendices and attachments) issued by EPA or the Wisconsin Department of Natural Resources (WDNR). For each permit:
 - a. specify the date of permit issuance;
 - b. provide a list of equipment permitted;
 - c. state whether the permit is a permit to install or permit to operate; and,
 - d. state whether the projects allowed by each of the permits requested were completed as described in the applications for each of the permits. If the project was completed in a different manner, provide a description of how it was changed.
2. Clearly identify and list which emission and process units, control devices, and stacks comprise each Tower at the Facility. Include the unit's permit identification numbers (e.g. Stack S15, Control Device C15, and Process P15), a description of the unit (e.g. scrubber, continuous mixer), and the date of installation.
3. Provide copies of all applications which were submitted by or on behalf of the Facility to the WDNR for construction, operating, PSD, or Title V permits since its construction, with the project number assigned by WDNR for such permitting request or action.
4. Provide copies of any and all Notices of Violation received from the WDNR or local environmental agency, and corrective action plans submitted to the WDNR from January 2008 to the present, relating to air emissions at the Facility.
5. Provide copies of any and all alternative monitoring, instrumentation, or operating scenarios that have been submitted to the WDNR including any responses from WDNR, diagrams, appendices, and attachments, relating to air emissions at the Facility.
6. For each calendar year from 2008 to present, provide copies of each periodic monitoring report, each deviation report, each annual air emission statement or report, and each annual compliance certification submitted to EPA and/or WDNR.
7. Provide monthly production data for each Tower from January 1, 2008 to the date of this request.
8. For each emission test, emission characterization, performance test, compliance test, engineering test, test for general information, capture efficiency study or test, and any test, analysis, or determination of destruction efficiency, for any air pollutant conducted since January 1, 2005, provide a copy of the full test report. Include all test runs, even if

a full test series was not completed. Indicate whether such report was shared with the local and/or state permitting agency. For each test during which the source was not operating at maximum design capacity, provide an explanation why production was limited. If not included in the report, also provide the following:

- a. the emission unit being tested;
 - b. the date of the test;
 - c. the test method(s) used;
 - d. the section describing the process parameters and production or processing rates at the time of the test; and,
 - e. copies of any reports of visible emission observations conducted during each test.
9. Provide a list of all air pollution control equipment used at the Facility since its construction (e.g. baghouses, wet scrubbers, thermal oxidizers, etc.). The list must include the date of startup (and shutdown, if applicable) of the equipment, the manufacturer, type of equipment, a listing of all units which use the equipment for air pollution control, and general operating parameters (i.e. flow rate, capacity, removal efficiency, etc.). For statements of removal efficiency, describe in detail how this was determined (e.g. testing, manufacturer rating), and provide all documents relevant to that determination. If the equipment has been shut down or removed, describe in detail the reason for shut down or removal and what if any equipment has replaced it.
10. For each baghouse listed in Paragraph 9, from January 1, 2008 to the date of this information request, provide:
 - a. baghouse type (e.g., pulse jet);
 - b. fabric filter material used and manufacturer specifications;
 - c. baghouse capacity;
 - d. fan type(s) and capacities;
 - e. dates of installation of all improvements and modifications, and a narrative summary of the improvements and modifications made;
 - f. a list of all emissions units connected to the baghouses and a detailed explanation of how emissions are routed to it (such as via ducted pickup points, canopies, hoods, etc.). Include a description of any capture mechanisms, and the location of all devices used to measure air flow or pressure;
 - g. all records of the differential pressure readings taken at each baghouse in an Excel Workbook or other compatible format, including the date and time of the readings;
 - h. all inspection, maintenance, and repair logs; and,
 - i. a list of periods when an emission source was in operation, but the process baghouse was down. Provide this information in an Excel Workbook or other compatible format. For each period the process baghouse was down, provide an explanation as to why the process baghouse was down.
11. At the time of this request, if the Facility is operating one or more scrubbers, identify the scrubber unit and provide the following information from January 1, 2008 to the date of this request, for each scrubber at the Facility:

- a. a complete description of the method of operation of the wet scrubbers, including but not limited to:
 - i. the average and maximum liquor flow rate;
 - ii. the normal and minimum recycle rate (i.e. the percentage of the entire flow of liquor through the scrubber that consists of liquor that has already passed through the scrubber);
 - iii. the contents of the scrubbing liquor. If water, where the water comes from and how it has been treated;
 - iv. the fate of spent scrubbing liquor; and,
 - v. the frequency of complete liquor change-outs.
 - b. records documenting quantity and date of spent scrubbing liquor sent off-site for disposal;
 - c. copies of any and all spent scrubbing liquor analysis testing which quantifies the VOC and/or HAP retention in the spent scrubbing liquor;
 - d. in Microsoft Excel or other compatible format, the pressure drop across the wet scrubbers and demister, in inches of water column, the pH of the absorption scrubbing fluid, the flow of liquor in gallons per minute, and the motor power of the scrubber liquor recirculation pump;
 - e. manufacturer's specifications operating manual for each scrubber;
 - f. records of all inspections, checks, and any maintenance or repairs performed on the wet scrubber system, containing the date of the action and the results;
 - g. date and documentation of the last calibration of the wet scrubber pressure drop, liquor flow, and pH monitoring devices;
 - h. the frequency of removal of scrubber sludge;
 - i. a description of the fate of the scrubber sludge including any log or listing which notates of the amount discarded and location or locations it is sent or sold;
 - j. records documenting quantity and date of scrubber sludge that is sent off-site for disposal;
 - k. any testing conducted on the sludge; and,
 - l. a list of periods when an emission source was in operation, but the process wet scrubber or scrubbers were not in operation. Provide this information in an Excel Workbook or other compatible format. For each period the process scrubber was down, provide an explanation as to why the process scrubber was down.
12. At the time of this request, if the Facility is operating one or more thermal oxidizers, provide the following information for each thermal oxidizer on both Towers A and B:
- a. the date the control device became operational;
 - b. if emission testing has not yet been conducted on the thermal oxidizer, provide a full copy of the test protocol for any planned testing and any proposed schedules for testing. Ensure the protocol includes at least the information listed in Appendix D;
 - c. records of calibration;
 - d. from the date the device became operational to the date of this request, provide in Excel Workbook or other compatible format, oxidizer combustion chamber temperature records (°F);
 - e. provide copies of manufacturer specifications for the thermal oxidizers at the

- Facility. Specifications must include a diagram of the entire unit and any filters, particulate capture systems, or other capture system the unit utilizes. If filters are a part of the oxidizer, provide a date (MM/DD/YYYY) and description of any issues the Facility has had with the internal filters; and,
- f. a list of periods when an emission source was in operation, but the process thermal oxidizer was down. Provide this information in an Excel Workbook or other compatible format. For each period the process thermal oxidizer was down, provide an explanation as to why the process thermal oxidizer was down.
13. Provide lists or logs of all maintenance performed on the oxidizers at the Facility from August 1, 2012 to the date of the planned thermal oxidizer performance testing.
 14. Provide all Material Safety Data Sheets (MSDS) (or other technical documents which show the free phenol content of each resin used) of all resins, product additives, and product line cleaning solutions used from January 1, 2008 to the date of this request.
 15. Provide copies of any and all product testing which documents the Volatile Organic Compound (VOC) and/or Hazardous Air Pollutant (HAP) retention in the resin-coated sand product(s).
 16. Provide complete copies of any reports of analyses of the VOC content of resins, product additives, and product line cleaning solutions used from January 1, 2008 to the date of this request.
 17. Provide, in Microsoft Excel or other compatible format, daily usage of hexamethylene tetramine (hexa) for each Tower in pounds per day and pounds per month from January 1, 2008 to the date of this request.
 18. Provide, in Microsoft Excel or other compatible format for each Tower, from January 1, 2008 to the date of this request, the total amount of each resin, product additive (ex. chembetaine, silicone, etc.), and cleaning solution used in pounds per month.
 19. Provide, in Microsoft Excel or other compatible format, a spreadsheet showing monthly emissions for each Tower individually of: Particulate Matter (PM), PM₁₀, PM_{2.5} (lb/hr), VOC (lb/hr), phenol (lb/hr, lb/month), ammonia (lb/hr), formaldehyde (lb/hr), and nitrogen oxides (NO_x) (lb/hr and lb/lb hexa), from January 1, 2008 to the date of this request. Also include a detailed explanation of the methods used to determine the total emissions for each pollutant, any and all associated calculations, and emission factors. Clearly indicate the source of any emission factors used in these calculations (i.e. manufacturer, AP-42, etc.) If a manufacturer-given factor, provide the document or documents which indicate, describe, or note the proper use of the factor.
 20. Provide a list of all capital and maintenance projects of an amount greater than \$25,000 on emission units at the Facility and were approved or completed between January 1, 2010 and the date of this request. For each project, identify the work performed, the date completed or projected to be completed, and the dollar amount approved and/or

expended.

Appendix D

Protocol Content

General information:

1. Name and address of emission facility;
2. Name, title, telephone number, and email address of contact person at emission facility; and,
3. Name, contact person, telephone number, and email address for testing company contracted to conduct the test.

Testing requirements:

4. Identification of the emission unit(s);
5. Schematic drawing of the stack and sample ports; and,
6. Schematic drawing of the sampling points to be used.

Operating conditions:

7. Operating rate and conditions of the process equipment and air pollution control equipment to be maintained during the test;
8. Description of the product to be produced including an explanation of why this product is to be produced; and,
9. Description of how air pollution control and process equipment will be monitored.

Methods:

10. List of the EPA Reference Methods to be used to determine the emission rate of volatile organic compounds;
11. Number of test runs, length of test run, and sampling rate for each method;
12. Any sampling or analytical procedures to be used that differ from those in the EPA Reference Methods; and,
13. Summary of reasons for proposing to use any alternative or equivalent method or procedures.